CRAWFORD STREET CORPORATION
P.O. Box 10047
Portland, Oregon 97296-0047
(503) 224-9900

November 29, 2001

Ms. Barbara Grover, Associate Planner
Portland Bureau of Planning
1900 S. W. Fourth Avenue
Portland, OR 97201

Re: Crawford Street Corporation/ Willamette River Inventory

Dear Ms. Grover,

I understand that you spoke with Ann Gardner recently about our concerns regarding the Crawford Street designation as a habitat site as identified on page 13 of the August 2001 Willamette River Atlas. The atlas references the Adolfson Associates Inc. 1999-2000 assessment which was published in draft form last year as the Willamette River Inventory: Natural Resources report.

We take exception to the designation in both the Willamette River Inventory and the River Atlas, and respectfully request that this designation be lifted from our property.

The Crawford Street Corporation property, an industrial site located on the Willamette River in North Portland, is identified in the Willamette River Inventory as a site with significant wildlife value (Portland 2000). Though this site may have a more natural appearance than the rest of the industrialized portion of the Lower Willamette River, we must question whether the site has true value to the wildlife species of concern listed in the report, and we must therefore question the methods used to determine such value. Prioritizing this site for habitat improvement is inconsistent with common practices in conservation biology and habitat restoration. Protecting wildlife habitat and thus preserving species should progress by first protecting and preserving the best quality habitat available. Habitat improvement in degraded and highly fragmented landscapes is expensive, ineffective, and frequently deleterious to the populations that we are trying to preserve.

The Crawford Street property has several attributes that diminish its value to fish and wildlife both in the present and in terms of future habitat potential relative to other sites in the lower Willamette River. For example:

- it is constructed on consolidated fill that is relatively resistant to root development for plants.
- its shoreline is covered with rubble and bordered by old pilings.
- it is downstream of both municipal and industrial waste outfalls.

- it is adjacent to the heavily contaminated McCormick & Baxter Superfund site.

By creating an island of habitat in an otherwise degraded area, the site could become an attractive nuisance that would expose valued wildlife to increased predation and contamination.

The Crawford Street property lies within the Willamette Cove habitat area (Site 2.1a). The Willamette Cove site is reported to have some of the highest potential habitat value in the industrialized reach of the river due to "a nearly continuous stretch of natural and semi-natural banks and beach from the BES water quality lab to the railroad bridge" (Portland 2000). However, the Habitat Assessment Ratings in the report indicate that the site receives low (on average) WHA scores, and has minimal enhancement potential.

The Crawford Street property includes a narrow strip of trees next to the river that are described in the report as mixed bottomland forest dominated by young black cottonwood, mixed with invasive plant species. This forest buffer becomes wider on upstream properties and does not exist on downstream properties except for a few scattered trees in Cathedral Park. In fact, the forest habitat is highly degraded throughout the Willamette Cove site. Where vegetation exists, invasive plant species predominate. The few snags on the site are reported to be young trees killed by English Ivy (Portland 2000). Establishing a productive native plant community at this site would require extensive maintenance for several years after initial planting to control the invasive species. Additionally, there is an extensive informal trail system through the forest fragment that is causing erosion problems at the site. Besides the obvious disturbance caused by recreationalists, these trails increase the fragmentation of the forest and diminish habitat value to small mammals, ground nesting birds, and amphibians by providing corridors for pest species.

The Willamette Cove site is across the river from the extensively forested Forest Park so habitat improvement at the Willamette Cove site would increase the fragmented forest landscape used by bird species and other species centered in the park. However, due to the small size and degraded quality of the Willamette Cove site, it is unlikely that this area would serve as productive habitat for anything other than human-adapted species. Nesting success in edge habitat such as that provided by the Willamette Cove site is low due to nest predators such as crows, raccoons, opossums, squirrels and house cats. Additionally, rates of brood parasitism by cowbirds are higher near wooded edges (Johnson and Temple 1990). In addition to problems caused by fragmentation, soil contamination (of unknown nature and extent) would potentially expose animals to toxic chemicals. Thus, at best, improvements at this site would increase perching opportunities for birds. It may, however, serve as an attractive nuisance to nesting birds, and other valued animals thereby putting them at risk from human-adapted pest species.

The fish habitat section of the Willamette River Inventory report characterizes this reach of the river as heavily industrialized, with uncommon pockets of natural banks

and backwater habitats. The report states that there is little of specific value related to fish resources along this stretch. Additionally both water and sediment pollution are cited as limiting factors. The fish section concludes that conservation opportunities in this reach are extremely limited. Despite the poor quality of the reach for fish habitat, the report describes the Willamette Cove site as "the most notable opportunity for fisheries enhancement within segments 2 or 3" (The downtown and industrial reaches). However, the Willamette River Inventory: Natural Resources report acknowledges that habitat enhancement at this site could result in an attractive nuisance that would adversely affect juvenile salmonids. Tabor, et al. (1993) showed that predation on juvenile salmonids increased in areas that attracted both warmwater species and juvenile salmonids, particularly off-channel areas adjacent to developed shoreline. This reach of the river already supports a large population of non-indigenous warmwater predators (Farr and Ward 1993). Therefore, successful habitat improvement for juvenile salmonids could create conditions ideal for increased predation on them.

In conclusion, due to its location in the midst of the industrialized segment of Portland Harbor and the attributes of the property, the Crawford Street property is of limited value to wildlife and improvements at this site may result in an attractive nuisance that could be deleterious to species of fish and other wildlife valued by the citizens of Portland. The Willamette River Inventory: Natural Resources report clearly shows that the quality of habitat in the North and South Reaches of the study area are of greater value to wildlife. The current condition of sites in these areas is better than those in the downtown and industrialized segments of the study area and the ecological context of the sites is of substantially less fragmented habitat. Therefore protection and conservation of habitats in these areas would be more cost effective and have greater benefit to the species that we are trying to protect, rather than spending money and resources on degraded sites in poor ecological contexts such as the Willamette Cove site.

Again, based on the factors discussed above, we respectfully request that the significant wildlife value designation be lifted from our property in both the Willamette River Inventory report and the River Atlas. We would also appreciate receiving a written response to this request once you have had the opportunity to review it.

Sincerely,

Mathew Cusma
Environmental Administrator
(503) 286-6944

cc: Diane Brunberg, Portland Bureau of Planning

Citations:

Johnson RG, Temple SA. 1990. Nest predation and brood parasitism of tallgrass prairie birds. J Wildl Mgmt 54:106-111.

Portland. 2000. Willamette River Inventory: Natural resources, Public Review Draft August 2000. City of Portland, Oregon. Bureau of Planning.

Tabor RA. Shively RS, Poe TP. 1993. Predation on juvenile salmonids by smallmouth bass and northern squawfish in the Columbia River near Richland, Washington. N Am J Fish Manage 13:831-838.

Farr RA, Ward DL. 1993. Fishes of the Lower Willamette River, near Portland, Oregon. Northwest Sci. 67:16-22.